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The Davis Law Firm.
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Attorneys for Defendants ANTIOCH UNIFIED
SCHOOL DISTRICT, BOARD OF EDUCATION
OF ANTIOCH UNIFIED SCHOOL DISTRICT,
DR. DONALD GILL, KAI MONTGOMERY,
KAREN MATES, WENDY AGHILY, TOBINWORLD,
MIKE WILLIAMS, SARA FORGHANI,
TERESA TURNER, CHEREE MOSLEY,
ASHLEY CURTIN, and STEPHANIE BROWN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ADRIANNE PANTELL, as Guardian ad Litem of
DP, a minor,

Plaintiff,

vs.

ANTIOCH UNIFIED SCHOOL DISTRICT;
BOARD OF EDUCATION OF ANTIOCH
UNIFIED SCHOOL DISTRICT; DR.
DONALD GILL, individually and in his official
capacity as Superintendent of Antioch Unified
School District; DAVID WAX, an individual and
in his official capacity as former Director of
Special Education for Antioch Unified School
District; KAI MONTGOMERY, an individual
and in her official capacity as former
Coordinator of Special Education; KAREN
MATES, individually and in her official
capacity as Director of Special Education for
Antioch Unified School District; WENDY
AGHILY, individually and in her official

Case No. C 14-01381 KAW

**STIPULATION AND ~~[PROPOSED]~~ ORDER
RE: EXTENSION OF TIME FOR CERTAIN
DEFENDANTS TO RESPOND TO
COMPLAINT; AND FOR EXTENSION OF
CASE DEADLINES SPECIFIED IN ORDER
SETTING INITIAL CASE MANAGEMENT
CONFERENCE AND ADR DEADLINES
(Doc. 4)**

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Case No. C 14-01381 KAW

STIPULATION AND [PROPOSED] ORDER RE: EXTENSION OF TIME FOR CERTAIN DEFENDANTS TO
RESPOND TO COMPLAINT; AND FOR EXTENSION OF CASE DEADLINES SPECIFIED IN ORDER SETTING
INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES (Doc. 4)

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capacity as Program Specialist for Contra Costa SELPA; TOBINWORLD, a non-profit entity doing business as a California certified nonpublic school; MIKE WILLIAMS, individually and in his official capacity as Vice President and Behaviorist for Tobinworld; SARA FORGHANI, individually and in her official capacity as Principal of Tobinworld; TERESA TURNER, individually and in her official capacity as Teacher at Tobinworld; CHEREE MOSLEY, individually and in her official capacity as Teacher's Aide at Tobinworld; ASHLEY CURTIN, individually and in her official capacity as Teacher's Aide at Tobinworld, STEPHANIE BROWN, individually and in her official capacity as Teacher's Aide at Tobinworld and DOES 1-10 inclusive,

Defendants.

Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN having been served with process in this case in May 2014, the parties desire to permit additional time for:

1. Defendants and their counsel to conduct fact investigation prior to responding to the Complaint; and

2. The parties to engage in am informal, preliminary case discussions.

Accordingly, IT IS HEREBY STIPULATED between ANDREA M. TYTELL, counsel to Plaintiff ADRIANNE PANTELL, as Guardian ad Litem of DP, a minor, and TIMOTHY J. DAVIS, Counsel to Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS, SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE BROWN, that:

///

1 1. The date for Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF
2 EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI
3 MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS,
4 SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE
5 BROWN to respond to Plaintiff's March 26, 2014 Complaint for Damages is extended to June 15,
6 2014; and

7 2. The dates specified in this Court's Order Setting Initial Case Management Conference
8 and ADR Deadlines, dated March 26, 2014 (Doc. 4) be extended as follows:

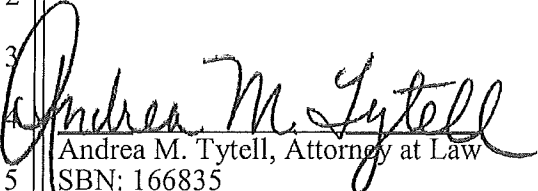
EVENT	ORIGINAL DATE	EXTENDED DATE
11 Last day to: 12 · meet and confer re: initial disclosures, early settlement, ADR 13 process selection, and discovery plan 14 · file ADR Certification signed by Parties and Counsel (form 15 available at cand.uscourts.gov) 16 · file either Stipulation to ADR Process or Notice of Need for 17 ADR Phone Conference (form available at cand.uscourts.gov)	June 3, 2014	July 15, 2014
18 Last day to file Rule 26(f) Report, complete initial disclosures or 19 state objection in Rule 26(f) Report and file Case Management 20 Statement per attached Standing Order re Contents of Joint Case 21 Management Statement (also available at cand.uscourts.gov)	June 17, 2014	July 29, 2014
22 INITIAL CASE MANAGEMENT CONFERENCE 23 (CMC) in Courtroom 4, 3rd floor at 1:30 PM 24 25	June 24, 2014 1:30 p.m. Courtroom 4 3 rd Floor	August 5, 2014 1:30 p.m. Courtroom 4 3 rd Floor

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1 Dated: May 27, 2014.

Dated: May 27, 2014.

THE DAVIS LAW FIRM

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3 
4 Andrea M. Tytell, Attorney at Law
5 SBN: 166835

LAW OFFICES OF ANDREA M. TYTELL

6 2121 Rosecrans Avenue, Suite 1350

El Segundo, California 90245

7 Telephone: (310) 416-9710

Attorneys for Plaintiff

8 ADRIANNE PANTELL, AS GUARDIAN AD
9 LITEM OF DP, A MINOR

By: 

TIMOTHY C. DAVIS

Attorneys for Defendants

ANTIOCH UNIFIED SCHOOL DISTRICT,
BOARD OF EDUCATION OF ANTIOCH
UNIFIED SCHOOL DISTRICT, DR.

DONALD GILL, KAI MONTGOMERY,

KAREN MATES, WENDY AGHILY,

TOBINWORLD, MIKE WILLIAMS, SARA

FORGHANI, TERESA TURNER, CHEREE

MOSLEY, ASHLEY CURTIN, and

STEPHANIE BROWN

11 ~~PROPOSED~~ ORDER

12 The parties having so stipulated, and good cause appearing therefor,

13 IT IS HEREBY ORDERED that:

14 1. The date for Defendants ANTIOCH UNIFIED SCHOOL DISTRICT, BOARD OF
15 EDUCATION OF ANTIOCH UNIFIED SCHOOL DISTRICT, DR. DONALD GILL, KAI
16 MONTGOMERY, KAREN MATES, WENDY AGHILY, TOBINWORLD, MIKE WILLIAMS,
17 SARA FORGHANI, TERESA TURNER, CHEREE MOSLEY, ASHLEY CURTIN, and STEPHANIE
18 BROWN to respond to Plaintiff's March 26, 2014 Complaint for Damages is extended to June 15,
19 2014; and

20 2. The dates specified in this Court's Order Setting Initial Case Management Conference
21 and ADR Deadlines, dated March 26, 2014 (Doc. 4) are extended as follows:

EVENT	ORIGINAL DATE	EXTENDED DATE
Last day to: meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan	June 3, 2014	July 15, 2014

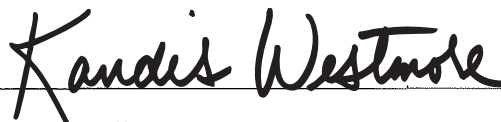
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<ul style="list-style-type: none"> file ADR Certification signed by Parties and Counsel (form available at cand.uscourts.gov) file either Stipulation to ADR Process or Notice of Need for ADR Phone Conference (form available at cand.uscourts.gov) 		
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement per attached Standing Order re Contents of Joint Case Management Statement (also available at cand.uscourts.gov)	June 17, 2014	July 29, 2014
INITIAL CASE MANAGEMENT CONFERENCE (CMC) in Courtroom 4, 3rd floor at 1:30 PM	June 24, 2014 1:30 p.m. Courtroom 4 3 rd Floor	August 5, 2014 1:30 p.m. Courtroom 4 3 rd Floor

IT IS SO ORDERED.

Date: 6/2/14



Hon. Kandis A. Westmore
UNITED STATES MAGISTRATE JUDGE